

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

MONTVALE SURGICAL CENTER, LLC a/s/o
various "PATIENTS",

Plaintiff,

vs.

CONNECTICUT GENERAL LIFE
INSURANCE COMPANY d/b/a CIGNA,
CIGNA HEALTHCARE OF NEW JERSEY,
INC.; ABC CORPS. (1-10)(said names being
fictitious and unknown entities),

Defendants.

Civil Action No. 12-05257 (SRC) (CLW)

Document electronically filed

**STIPULATION AND CONSENT
ORDER TO ANSWER, MOVE, OR
OTHERWISE RESPOND TO THE
AMENDED COMPLAINT**

This matter having been brought before the Court on the joint application of Defendant Connecticut General Life Insurance Company ("CGLIC"), by its counsel, Gibbons P.C., and Plaintiff Montvale Surgical Center, LLC, by its counsel, Massood & Bronsnick, LLC, for the entry of a Stipulation and Consent Order to extend the time for CGLIC to answer, move, or otherwise respond to Plaintiff's Amended Complaint; it being further stipulated that (1) CGLIC's Answer or Other Response is due on April 19, 2013; (2) an Application for a Clerk's Order extending the time to answer for fourteen (14) days was previously granted; and (3) with this extension, CGLIC's Answer or Other Response would be due on May 10, 2013; and good cause appearing for the entry of an Order extending the time in which CGLIC may answer, move, or otherwise respond as to the Amended Complaint,

IT IS on this _____ day of April, 2013,

ORDERED that the time within which CGLIC may answer, move, or otherwise respond as to the Amended Complaint be and hereby is extended to May 10, 2013.

STIPULATED AND AGREED TO BY:

s/E. Evans Wohlforth, Jr., Esq.

Allana L. Nason, Esq.

E. Evans Wohlforth, Jr., Esq.

GIBBONS P.C.

One Gateway Center

Newark, New Jersey 07102-5310

Tel: (973) 596-4583

Fax: (973) 639-6389

*Attorneys for Defendant Connecticut General
Life Insurance Company*

Dated: April 9, 2013

s/Andrew R. Bronsnick, Esq.

Andrew R. Bronsnick, Esq.

MASSOOD & BRONSNICK, LLC

50 Packanack Lake Road East

Wayne, NJ 07470-6663

Tel: (973) 696-1900

Fax: (973) 696-4212

Attorneys for Plaintiff

Dated: April 9, 2013

SO ORDERED:

Honorable Stanley R. Chesler
United States District Judge